

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
v.) Crim. No. 20-cr-10197-LTS
)
JOSHUA TEIXEIRA, et al,)
)
Defendants.)
)

SECOND PROTECTIVE ORDER

In connection with above entitled case, the parties jointly propose a Second Protective Order (dealing with non-law enforcement witness information) with the following terms:

- 1) All members of the Defense Team shall execute the Agreement to the Terms of the Second Protective Order (the “Agreement”) prior to receiving, accessing and/or reviewing any materials/disclosures marked “Attorneys’ Eyes Only – Second Order.”
- 2) For purposes of this Order and Agreement, the term “Defense Team” shall include attorneys of record, support staff, investigators and any other individuals retained to participate in the defense of this case.
- 3) The Defense Team shall maintain any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only – Second Order” in accordance with this Agreement and these materials shall be used by the Defense Team solely and exclusively in connection with the litigation and trial of this case.
- 4) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only – Second Order” shall not be disclosed and/or transmitted in any way (including in writing, electronically or verbally) to any defendant in this case, unless otherwise ordered by this Court.
- 5) Any pretrial documents/disclosures which are marked “Attorneys’ Eyes Only – Second Order” shall not be disclosed and/or transmitted in any way (including in writing, electronically or verbally) to any person other than the Defense Team, unless otherwise ordered by this Court. This prohibition includes interviewing and/or communicating with any person outside of the Defense Team in order to investigate, locate and/or identify the identity of, or information concerning, any individual documented in any documents/disclosures which are marked “Attorneys’ Eyes Only – Second Order.”
- 6) Absent further Order of the Court, the terms and limitations of this Order and Agreement will continue to be in effect and binding following the termination of the case.

- 7) Execution of this Second Protective Order does not preclude any of the parties to this case, currently or in the future, from seeking leave from the Court to modify the conditions of this Order at a later date.

So Ordered,

Dated: 3/12/2021

/s/ M. Page Kelley

The Honorable M. Page Kelley
United States Magistrate Judge

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AGREEMENT TO THE TERMS OF THE SECOND PROTECTIVE ORDER

I acknowledge and agree that I have reviewed the Second Protective Order, dated _____, issued by the Court in the above-referenced case, and agree that I am bound by the terms of the Agreement and corresponding Order.

Counsel for [DEFENDANT NAME]

[ATTORNEY NAME]

Dated: